IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SCANNED

ROGER REIFF, individually and on behalf of all others similarly situated,

Plaintiffs

No.

1:07-cv-06011-LAP

V

FRANK A. METZ, JR.; et al.,

Defendants

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NOTICE OF MOTION AND MOTION TO ADMIT ELLEN M. DOYLE PRO HAC VICE

PLEASE TAKE NOTICE that pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Ronen Sarraf, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of Ellen M. Doyle, of Stember Feinstein Doyle & Payne, LLC, Allegheny Building, 17th Floor, 429 Forbes Avenue, Pittsburgh PA 15219 (Tel: 412-281-8400; Fax 412-232-3730). Ellen M. Doyle is in good standing of the Bar of the Commonwealth of Pennsylvania. There are no pending disciplinary proceedings against Ellen M. Doyle in any State or Federal court.

Dated: August 23, 2007

New York, New York

SARRAF GENTILE LLP

Ronen Sarraf (RS-7694)

11 Hanover Square New York, NY 10005

Tel: 212-868-3610 Fax: 212-918-7967

Attorneys for Plaintiff



IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ROGER REIFF , individually and on behalf of all others similarly situated,		
Plaintiffs	No.	1:07-cv-06011-LAP
v	<u> </u>	
FRANK A. METZ, JR.; et al.,		
Defendants		

AFFIDAVIT OF RONEN SARRAF

State of New York)	
)	ss:
County of New York)	

RONEN SARRAF, being duly sworn, deposes and says:

- I am an attorney admitted to practice in the State of New York and in the Southern and Eastern Districts of New York and am a member with the firm of SARRAF GENTILE LLP. I submit this Affidavit in support of the motion to admit Ellen M. Doyle to the bar of this Court pro hac vice for purposes of this action.
- I agree to act as local counsel for Ellen M. Doyle and to observe the Rules of this Court governing the conduct of attorneys.
- Ellen M. Doyle is a member in good standing of the Bar of the Commonwealth of Pennsylvania.
- For the foregoing reasons, it is respectfully requested that Ellen M. Doyle be admitted pro hac vice to the bar of this Court for purposes of this action.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Notar, Many Street

· Official states

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Sworn to and subscribed before me this 22day of 1275+, 2007.

Notary Public

My commission expires:

IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ROGER REIFF , individually and on behalf of all others similarly situated,		
Plaintiffs	No.	1:07-cv-06011-LAP
V		
FRANK A. METZ, JR.; et al.,		
Defendants		

AFFIDAVIT OF ELLEN M. DOYLE

Commonwealth of Pennsylvania)	
)	SS
County of Allegheny)	

ELLEN M. DOYLE, being duly sworn, deposes and states as follows:

- 1. I am a member of the law firm of STEMBER FEINSTEIN DOYLE & PAYNE, LLC located at Allegheny Building, 17th floor, 429 Forbes Avenue, Pittsburgh PA 15219 and submit this Affidavit in support of the motion for my admission *pro hac vice* on behalf of Plaintiff for purposes of this action.
- 2. I am a member in good standing of the Bar of the Commonwealth of Pennsylvania as evidenced by the attached Certificate of Good Standing. I have not been the subject of disciplinary action by any Court or Bar.
- 3. I agree to observe strictly the dates for scheduling conferences, motions, briefs, trials and other proceedings before this Court. I further agree to submit to the jurisdiction of this Court for the purposes of sanctions, discipline or other such actions as the Court may deem proper. I am familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Rules of this Court, and I agree to abide by them.
- 4. For the foregoing reasons, I respectfully request that the permit me to speak in the above-captioned matter in the same manner as attorneys admitted to practice before the United States District Court for the Southern District of New York.

Sworn to and subscribed before me this 13th day of lugust, 2007.

Ellen M. Doyle

Votary Public

My commission expires:

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal Linda J. McNeil, Notary Public City Of Pittsburgh, Allegheny County My Commission Expires July 12, 2011

Member, Pennsylvania Association of Notaries



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Ellen Mary M. Doyle, Esq.

DATE OF ADMISSION

November 3, 1975

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal Dated: July 26, 2007

> Patricia A. Nicola Chief Clerk

IN THE UNITED STATI	ES DISTRICT COURT
SOUTHERN DISTRICT	OF NEW YORK

ROGER REIFF, individually and on behalf of all others similarly situated,

Plaintiffs

No. 1:07-cv-06011-LAP

ν

FRANK A. METZ, JR.; et al.,

ORDERED that:

Defendants

[PROPOSED] ORDER GRANTING APPLICATION OF ELLEN M. DOYLE FOR ADMISSION *PRO HAC VICE*

This matter coming before the Court by Motion and by affidavit of Ronen Sarraf seeking the admission of Ellen M. Doyle to the United States District Court for the Southern District of New York *pro hac vice* for purposes of this action, and the Court having considered the Affidavit of Ellen M. Doyle submitted in support thereof, and for good cause shown,

IT IS ON this	day of	, 2007,

- 1. Ellen M. Doyle is hereby granted admission *pro hac vice* to the United States District Court for the Southern District of New York for the purpose of appearing in this action, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York;
- 2. Ellen M. Doyle is required to abide by and is subject to the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York; and
- 3. Ellen M. Doyle is required to notify the court immediately of any matter that affects her standing at the Bar of any court.

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UNITED	STATES	DISTRICT	JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2007, a true and correct copy of the foregoing documents were filed with the Court and served by first class U.S. mail upon the following counsel:

Robert M. Stern Karen M. Wahle Khuong G. Phan O'MELVENY & MYERS LLP 1625 Eye Street, NW Washington, DC 20006-4001

Michael J. Dell Brendan M. Schulman KRAMER LEVIN NAFTALIS & FRANKEL LLP 1177 Avenue of the Americas New York, NY 10036

Ronen Sarraf